

REMARKS

Applicant has filed a Request for Continued Examination concurrent with this Amendment and respectfully requests reconsideration of this application, and reconsideration of the Office Action dated June 9, 2004. Upon entry of this Amendment, claims 2-4, 7, and 9-25 will be pending in this application. Claims 13-20 are currently withdrawn. The changes to claims 4 and 7 are supported by the specification and original claims. No new matter is incorporated by this Amendment.

Applicant gratefully acknowledges the Examiner's indication that claims 2 and 3 are allowed. Applicant also acknowledges the Examiner's indication that claims 9, 11, 12, 21, and 22 contain allowable subject matter. The Examiner objected to these claims but indicated they would be allowable if rewritten in independent form including all of the features of their base claims and any intervening claims. As discussed below, claims 4 and 7, from which claims 9, 11, 12, 21, and 22 depend, are believed to be distinguished from the cited art. Hence, independent claims 4 and 7, as well as dependent claims 9, 11, 12, 21, and 22, are believed to be in condition for allowance.

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Claims 4, 7, 10, and 23-25 are rejected under 35 U.S.C. § 102(e) as anticipated by Nishimura et al. (U.S. Pat. No. 6,286,525). Applicant respectfully traverses.

Independent claim 4 (from which claims 23-25 depend) and claim 7 (from which claim 10 depends) both concern a substrate cleaning apparatus. According to each independent claim, the apparatus includes a first scrub head that locates over the substrate held by the spin chuck, and moves horizontally relative to the substrate through the rotation center of the substrate toward a periphery of the substrate. The apparatus of claim 4 and 7 also include a second scrub head that locates over the substrate together with the first scrub head, and moves horizontally relative to the substrate through the rotation center of the substrate toward a periphery of the substrate such that the second scrub head follows

the first scrub head. Nishimura neither teaches nor fairly suggests the above described feature and thus cannot anticipate the claimed invention.

Nishimura's apparatus includes more than one cleaning brush. However, in contrast to Applicant's apparatus, the two cleaning brushes only move within a certain radius in the X direction, with each brush covering a different radial area. See Column 6, Lines 13-42. In other words, Nishimura neither teaches nor fairly describes an apparatus that has a second scrub head that locates over the substrate together with the first scrub head, and moves horizontally relative to the substrate through the rotation center of the substrate toward a periphery of the substrate such that the second scrub head follows the first scrub head. Hence, for at least this reason, Nishimura fails to teach each and every feature of independent claims 4 and 7 and thusly cannot anticipate the invention of those claims.

In view of the above remarks, Applicant respectfully submits that the rejection is overcome. Hence, reconsideration and withdrawal of this rejection is requested.

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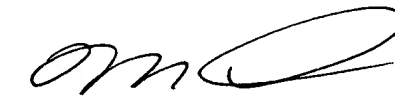
Applicant respectfully submits that this Amendment and the above remarks obviate the outstanding objection and rejection in this case, thereby placing the application in condition for immediate allowance. Allowance of this application is earnestly solicited.

If any fees under 37 C.F.R. §§ 1.16 or 1.17 are due in connection with this filing, please charge the fees to Deposit Account No. 02-4300; Order No. 033082.100.

If an extension of time under 37 C.F.R. § 1.136 is necessary that is not accounted for in the papers filed herewith, such an extension is requested. The extension fee should be charged to Deposit Account No. 02-4300; Order No. 033082.100.

Respectfully submitted,
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